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February 29, 2008

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
Tex-Link Communications, Inc. - 2008 CPNI Certification and Statement

Dear Ms. Dortch:

Tex-Link Communications, Inc. hereby submits an original and four (4) copies of our certification and statement, pursuant to Section 64.2009(e) of the Commission's Rules.

If you have any questions, please contact me at 210-892-4142.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shelly Hendrix', written over a horizontal line.

Shelly Hendrix
Vice President of Finance and Controller

Cc: Federal Communications Commission, Enforcement Bureau,
Telecommunications Consumers Division, 445 12th Street, SW, Washington, DC
20554 (2 copies)

Best Copy and Printing, Inc., via facsimile to 202-488-5563

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

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Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 29, 2008

Name of company covered by this certification: Tex-Link Communications, Inc.

Form 499 Filer ID: 813044

Name of signatory: J. Mark Griffin

Title of signatory: President and CEO


I, J. Mark Griffin, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

By:



J. Mark Griffin
President and CEO

TEX-LINK COMMUNICATIONS, INC.
CUSTOMER PROPRIETARY NETWORK INFORMATION
STATEMENT

Tex-Link Communications, Inc. respects our customers' right to maintain the confidentiality of their individual Customer Proprietary Network Information ("CPNI"). Tex-Link has a duty to protect the confidentiality of such CPNI and maintains the following policy to safeguard our customers' CPNI:

CPNI Defined

CPNI is "a) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and b) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."¹ Examples of CPNI are type of service, number of telephone lines, amount of usage, calling records and billing records. CPNI does not include publicly available information such as names and phone number.

CPNI Utilization

- 1) We use, disclose or permit access to CPNI to protect our rights and property, our customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- 2) We use CPNI to initiate, render, bill and collect for telecommunications services.
- 3) We use, disclose or permit access to CPNI to provide or market service offerings related to the same category of service (local or interexchange), or alternate version of the same service, to which a customer presently subscribes.
- 4) We use, disclose, or permit access to CPNI to a) provide inside wiring installation, maintenance and repair services; and b) in the event that we provide local services to a customer, to market services formerly known as adjunct to basic services, including, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.
- 5) We will disclose CPNI to any person designated by a customer upon receipt of an affirmative written request by the customer.
- 6) We will not disclose or release customer call detail information to anyone on a customer initiated call unless the customer provides a pre-established password, the customer requests information be sent to the address on record, or we call the customer telephone number on record and disclose the information.
- 7) We will not use CPNI to market Internet access or to identify or track customers who call competitive service providers.

¹ 47 U.S.C. § 222(f)(1).

- 8) We will disclose CPNI to law enforcement upon receiving an authorized request for such information from a law enforcement agency.

CPNI Approvals

- 1) When customer approval to use, disclose or permit access to customer CPNI is required, we obtain approval through written opt-in methods. We honor a customer's approval or disapproval until the customer revokes or limits such approval or disapproval. Records of customer approvals are maintained for one year.

CPNI Safeguards

- 1) The Director of Business Development shall maintain a record of any marketing campaigns utilizing customers' CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign. Any such marketing campaigns must be approved by the President and CEO. These records must be maintained for one year.
- 2) The Finance Department will maintain a listing of customers and their CPNI disclosure approval status.
- 3) We will train our personnel on the CPNI requirements on an on-going basis.
- 4) We will notify the US Secret Service and the FBI within seven business days of a breach in CPNI. Unless law enforcement officials prohibit notification, customers will be notified within seven more business days unless there is immediate danger or harm to the customer, which triggers immediate notification. The notification to the US Secret Service and the FBI shall be in the form of a letter and shall include the carrier's name, a description of the breach in CPNI, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. Records of breaches will be kept for two years.
- 5) Annually, the President and CEO will certify personal knowledge that the company has been in compliance with the above CPNI procedures and that those procedures are adequate to ensure we are in compliance with the applicable CPNI rules.
- 6) The customer's password may not be established on a customer initiated call. Passwords may not consist of available biographical information such as social security number, telephone number or customer name.
- 7) When there is a request to change the password, telephone number of record or online account information or address of record, a notice will be sent to the old address advising that a change request has been received. This notice will not contain the new address or password. If the customer believes that this change is unauthorized, the customer is to contact the Company immediately.
- 8) Should a customer request records or information from the Company that contains CPNI, such information will only be provided if (1) the customer provides a pre-established password, or (2) the information is mailed to the

address of record or (3) we call the customer back at the phone number of record and disclose the requested information or (4) the request is made in person at a Company office and the customer presents a drivers license or other government issued photo identification that proves that the requestee is the customer of record.